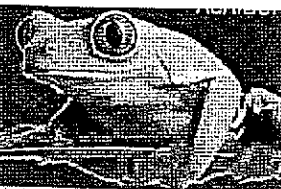


# AcaiBurn

The Secret Of The Amazon



**Dear Friend,**

It's good to contact you again. I hope you have enjoyed your trial offer of AcaiBurn. I want to congratulate you on deciding to continue to use AcaiBurn. This package contains your AcaiBurn System at the Preferred Customer discounted rate, so you can continue your weight loss program for years to come.

As the Customer Relations Manager for AcaiBurn, I want to keep working with you for months to come as you start to achieve your weight loss goals.

That's why I want to remind you, that while AcaiBurn can help reduce and maintain body weight, you still need to keep up with your diet and exercise plan. Following a healthy diet along with a regular workout routine is a sure-fire way to get you looking and feeling fit and revitalized.

## What If AcaiBurn Isn't Working For Me?

The AcaiBurn system has helped thousands of people lose weight and keep it off. Our active ingredients were shown in double-blind studies to help people lose weight up to 4.5 times faster than the group given a placebo. Both groups were put in a diet and exercise program, which should be part of any weight loss plan. If you are having trouble achieving the results you desire with AcaiBurn complete the following helpful checklist.

### Make Sure you are doing the following:

Take AcaiBurn as directed. Twice daily with eight ounces of water.

Write down everything you eat.

Control your food portions, eat six small meals per day.

Eat a balanced breakfast.

Hydrate yourself, drink at least six 8 ounce glasses of water each day.

Break a sweat 3x a week or more (\*If you can comfortably carry on a conversation, increase the intensity).

Avoid eating two hours before bed.

*\*Always consult with a physician before starting a new exercise program.*



I am glad you have made AcaiBurn part of your long-term weightloss success. Often I find if a client is having trouble losing weight, it just takes a few minor changes to get back on track and start seeing results. I can't wait to hear about how we have helped you feel confident, fit into your skinny clothes and find love while living a better life.

*Sarah Nicholson*

Sarah Nicholson  
(866)-989-8945



NATIONAL  
BREAST CANCER FOUNDATION  
FUNDING RESEARCH FOR PREVENTION AND CURE  
FUNDRAISING SUPPORT  
JTM-1 00026

Customer Service Toll-Free Number: (866)-989-8945

Premium White Pens	US	Canada
Methods of delivery	UPS MI	Canada Post
time from when order is placed till shipped	24 hours	24-48 hours
Is there tracking?	yes	no
time it takes till delivered	3-7 days	2-7 days
Vibrant White Trays		
Methods of delivery	UPS MI	Canada Post
time from when order is placed till shipped	24 hours	24-48 hours
Is there tracking?	Yes	yes
time it takes till delivered	3-7 days	2-7 days
All Pill products		
Methods of delivery	UPS MI	Canada Post
time from when order is placed till shipped	24 hours	24-48 hours
Is there tracking?	Yes	yes
time it takes till delivered	3-7 days	2-7 days

JTM-I 00027

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March 19, 2010

OF COUNSEL  
BRUCE S. DEMING, NH, DC, VA\*  
OTHER OFFICES:  
ROCKVILLE, MARYLAND

\*NOT ADMITTED IN MARYLAND

## CONFIDENTIAL

Kathryn C. Decker  
Federal Trade Commission  
915 Second Ave., Suite 2896  
Seattle, WA 98174

Dear Casey:

Enclosed please find the response of JustThink Media ("JTM") to your letter dated February 26, 2010. As you requested in earlier correspondence, JTM is providing you with financial documents submitted herewith as JTM 10149-10154. When you review them, you may notice that some of the revenue totals differ from the totals submitted to you in the form of raw sales data. JTM believes that such discrepancies may occur because some revenue which is withheld by creditors (such as banks) and is unlikely to be returned to JTM, effectively constitutes a liability. As such, revenue calculated according to the raw sales data may appear approximately 20% greater than if properly characterized on an income tax statement. JTM has provided you with this explanation in good faith, but these statements were not reviewed by a certified accountant.

The information provided herein contains trade secrets and other sensitive commercial information. As such, this letter constitutes a request for confidentiality pursuant to 15 U.S.C. §§ 46(f), 57b-2 and 16 C.F.R. §§ 4.10-4.11.

JTM's response follows:

1. **Specification 1:** *The information provided in JTM-100001 is incomplete. Although your clients provided the name and address of their companies, the trade names for 1021018 Alberta Ltd, and have stated that the countries listed for each company are the place of incorporation for each, you did not:*

a. *explain the nature of the relationship between the companies, including any*

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- overlapping officers, directors, and/or owners;*
- b. list the names of the officers and directors of each company,*
  - c. list, if privately held, the names and percentages of ownership of all stockholders of each company,*
  - d. list the date of incorporation for each company, and*
  - e. provide identifying information for Besiana Investments Ltd, Genta Holdings Ltd, Morgana Investments Ltd, and Rivierico Trading Ltd.*

*Please provide this information.*

*In addition, Dazzle White's "Contact Us" and "Terms and Conditions" pages direct consumers to contact Dazzle White's World Headquarters at Gillmap Limited, 9 Broomhill, Stanley DH9 8AZ, Durham. (JTM-CD 00001, Item 019,04.01.09.2009 - 06.30.2009, Dazzle White, contactus.jpg & terms.jpg; see also JTM-CD 00001, Item 019, 01.01.2009 - 03.31.2009, PureresV, terms.jpg) Gillmap Ltd did not appear on the list of companies Jesse Willms owns and operates. If this is one of Mr. Willms' companies, please provide the information as requested in Specification 1. If not, please describe the relationship between Gillmap Limited and your clients.*

This information was provided on JTM-CD 00002 in response to Request No. 001 in our March 5, 2010 correspondence to you.

2. Specification 2: *The information provided is incomplete. You state that your clients believe they do not need "separate" business licenses or other registrations to be able to conduct business in the United States or Canada. It is unclear what you mean by "separate." The Specification asks for all business licenses, registrations, or permits issued to each company by a state, province, or local government entity. This Specification would include, but not be limited to, incorporation documents. Please provide this information, as well as copies of these items.*

*In addition, the Specification asks your clients to provide a list of states or provinces in which each of your companies "conducts or has conducted business since January 2006," regardless of whether they have a license, registration, or permit to do business there. Please provide this information.*

*Finally, we would like a list of all countries in which each company conducts or has conducted business since January 2006.*

JTM is providing you with the corporate documents that it was able to identify and

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is submitting them herewith as JTM 10155-10165. To the extent that there are documents that are missing, JTM represents that it made a good faith effort to locate them, but was unable to do so.

JTM currently ships products to customers in the following locations:

- All 50 US States
- All 10 Canadian Provinces and 3 Territories
- Australia
- New Zealand
- Ireland
- England
- Scotland
- Wales.

In addition, JTM shipped products in the past to consumers located in the following locations:

- Puerto Rico
- Guam
- Virgin Islands
- 31 States of Mexico.

3. **Specification 3:** *The information provided in JTM-100002 is incomplete. Although your clients provided a list of managers and employees, the list does not designate the name of the company for which each manager or employee works. Please provide this information.*

All listed employees work for 1021018 Alberta, Ltd.

4. **Specification 5:** *The information provided in JTM-100003 is incomplete. Although your clients provided a list of the products they have offered for sale, they did not designate the name of the company that promoted, marketed, or sold each product listed. Please provide this information.*

The company that promoted, marketed or sold each product was 1021018 Alberta, Ltd. doing business as JTM.

5. **Specification 8:** *The information provided is incomplete. Although your clients provided the names of two companies that have participated in the development of websites, you did not explain the role Net Hues Technologies Pvt, Ltd., plays. Please provide this information.*

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*In addition, the Specification asks for the names and roles of those participating in the development of the content contained in the websites. Neither Mr. Willms nor any of Mr. Willms' companies were identified, although I believe you stated that Mr. Willms was involved in the creation and approval of all websites. Please clarify your answer.*

Net Hues Technologies Pvt, Ltd. provides JTM with the following services:

Website coding, development, and maintenance;  
Live chat customer support; and  
Monitoring of customer service agent calls.

The following people worked on developing content for websites at JTM:

Ahmed, Sameer  
Penner, Jeff  
Smits, Nolan  
Wiebe, Aaron  
Willms, Jesse.

6. **Specification 9:** *Your clients provided the names of five companies that have fulfilled customer orders (JTM-I 00004). We have information that suggests there is (or was) an additional fulfillment entity located at 5300 Ontario Mills Parkway, Unit 400, Ontario, CA 91764. If your clients have ever used a person or entity located at this address for fulfilling consumers' orders, please provide the information as requested by Specification 9.*

The address you indicate is a California office of AtLast, an entity previously disclosed to you.

7. **Specification 10:** *The information provided in JTM-100005 is incomplete Your clients provided the names of four companies that handle customer service and customer complaints, one being GC Services. Although there is no address given for GC Services, we understand from prior materials we received from you that there are two locations for GC Services - Texas and Oklahoma. I presume, given the area code, that Julio Avila is the Operations Manager for the Texas location. Please confirm this. If not, please provide us with the requested information about the person responsible for handling customer service issues and customer complaints in the Texas call center. In addition, you have not provided requested information regarding the Oklahoma call center. Please provide the information about it as requested by Specification 10. Finally, there is no individual named or telephone number listed for anyone at Nethues (sic) India. Please provide this information.*

Julio Avila is the operations manager at El Paso, Texas.

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Brett Bertacchi is the operation manager for the GS Services, the Oklahoma call center. That address is GC Services, 8121 NW Expressway, Oklahoma City, Oklahoma 73132.

Customer service at Net Hues Technologies Pvt, Ltd. is monitored by Shaleen Rana (live chat) and Rajeev Ahuja (voice recordings).

8. **Specification 11:** *Your clients provided the names of third party suppliers of products (JTM-100006). The list, however, does not designate what products each company supplies. Please provide this information.*

Dentech:	Teeth whitening pens
Earth's Creation USA, Inc.:	Pill products
For Your Smiles Only, LLC:	Teeth whitening pens and trays
International Printers:	Inserts, mailers and booklet printing for all products
Ion Labs Inc.:	Pill products
Nutricap Labs:	Pill products and teeth whitening pens

9. **Specification 13:** *The information provided is incomplete. Although your clients provided the name of one "affiliate marketing company" that has promoted, marketed, or sold products for them, they did not list the names of the products ROI Revolution has promoted, marketed, or sold on their behalf and the time period during which such products were promoted, marketed, or sold. Please provide this information.*

*In addition, please confirm whether ROI Revolution is the only affiliate marketer (or publisher) who has promoted, marketed, or sold products on behalf of your clients since January 2006. At our meetings, I believe you have stated that there are numerous affiliates (or publishers) who have driven traffic to your clients' websites. For your clients to list only one seems inconsistent with discussions we have had about the large number of affiliates (or publishers) who likely are promoting your clients' products, especially given your clients' extremely large sales volume. If there are in fact more affiliates (or publishers), please provide the information about each as requested in Specification 13.*

To the best of JTM's knowledge, ROI promoted the following products:

Wu-YiSource

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CreditReportAmerica  
AcaiBurn  
AcaiBurnMax  
AcaiSlimMax.

To clarify, ROI is not the only publisher/affiliate that has promoted JTM's products; it is the only one that JTM worked with directly. The other publishers/affiliates promoted JTM's products via advertising networks. As such, JTM only has information previously submitted to you regarding the advertising networks and not the individual publishers/affiliates.

**10. Specification 15:** *Your clients provided the addresses of post office box and private mail receiving agencies they have used (JTM-100009). We have information that suggests that the address of 22100 E. 126<sup>th</sup> Ave., #100, Aurora, CO, is the location of a fulfillment company, not a P.O. box or CMRA. If this address is for a fulfillment company, please provide the information as requested by Specification 9.*

The address you indicate is a new warehouse for AtLast, an entity previously disclosed to you.

**11. Specification 17:** *The information provided in JTM-100002 is incomplete. Although your clients provided a list of managers and employees, the list does not designate the name of the company for which each manager or employee works. Moreover, the Specification calls for an organizational chart and personnel directory for each company; these were not provided. Please provide these documents.*

All listed employees work for 1021018 Alberta Ltd. The other companies do not have any employees.

**12. Specification 18:** *The information provided in JTM-CD 00001 appears to be incomplete. First, although your clients provided webshots of their internet websites, the CD does not contain "recorded messages" that consumers are directed to listen to. For example, the AcaiBurn packaging from the sample you sent us lists a toll-free number that consumers are directed to call prior to using the product. Please provide all recorded messages.*

The digital recordings you requested are contained on JTM-CD 00003.

*Second, we need clarification on whether your clients, or others on their behalf, send emails to prospective consumers. I believe at one of our meetings you indicated that they did not, but that you would verify this. There is also a statement in one of your presentation materials that states "We do not send any unsolicited emails to any of our customers." (Compliance Overview Presentation, December 15, 2009, page 9 of Marketing Practices Section) However, there are materials on the CD that suggest that*

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*your clients are, at a minimum, involved in drafting the content of emails sent to prospective customers. {See, e.g., Item 018, JTM Creatives, Email Creatives;\* Item 018, JTM Creatives, JTM Offers - April 2009, Dazzlewhite.com, Subject-From.txt}*

*If your clients, or others on their behalf, send emails to prospective customers, please describe in detail your clients' role with respect to these emails including, but not limited to:*

- a. who drafts the emails;\*\**
- b. who has the authority to approve the emails;*
- c. to whom do you provide these emails; and*
- d. the source(s) of consumer names (e.g. lead lists) to whom emails are ultimately sent*

JTM does not conduct email marketing campaigns. However, advertising networks acquire affiliates that promote products via different types of specialization. The ad networks require JTM to provide general creatives and guidelines for each type of advertising (including email), whether or not there are affiliates promoting JTM's offers in such a manner. Jeff Penner, Nolan Smits and Sameer Ahmed design these creatives for JTM. Jesse Willms approves them.

As we have previously advised, JTM enters into agreements with the advertising networks and not the individual publishers/affiliates (except ROI as discussed above). JTM relies on these agreements to ensure compliance from the publishers/affiliates.

*[\* I was unable to view the email files under Item 018, JTM Creatives, Email Creatives, AcaiBurn Extreme, email\_01.jpg - 1\_17.jpg. Please provide hard copies of these.]*

This file does not contain an assembled creative. It appears that it contains graphic elements used to construct creative materials.

**13. Specification 21:** *The information provided in JTM-CD 00001 appears to be incomplete. First, you state that responsive documents are contained on the CD. However, we did not see anything on the CD that is responsive to this Specification other than passing references in some websites to samples, surveys, and user testing. Please direct us to items on the CD that you believe constitute "data or analyses of consumer perception, comprehension or recall of any websites used in the marketing of all products" and "market research or media or copy strategies prepared by you, or by any other person or entity on your behalf, regarding consumer attitudes or beliefs about negative option programs or continuity plans." If these documents are not on the CD, please provide them. If they do not exist, please state so.*

*Second, a number of the websites on the CD contain the following language: "All terms and conditions are fully disclosed several times throughout the site, and user testing is conducted on a regular basis to confirm that such areas of the site are clearly noticed and recognized....In addition, our team uses three different measures to test*

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*and verify that our terms and conditions are presented in a manner that is clear and conspicuous to the customer." {See e.g., Item 019,01.01.2009 - 03.31.2009, AcaiBum.com, advertising.png) Please provide all documents that refer to or discuss the "user testing" and the "three different measures."*

*Third, there is specific mention on a number of the websites on the CD that your clients have "commissioned an independent study to review how the public reads our ads." (See, e.g, Item 019,07.01.2009 - 09.30.2009, Acaislindextox, advertising.jpg). Please provide all documents that refer to or discuss this independent study.*

JTM provided this information to you in its March 12, 2010 submission in response to Requests Nos. 8 & 9.

*14. Your clients state that: "The average chargeback rate for JustThinkMedia from May 2008 to April 2009 was 1.045%." (Presentation materials from February 17,2010, meeting, p 4.) Please provide documents that form the basis of this claim.*

Responsive information is contained on JTM-CD 00003.

*15. Your clients state that there were: "6,135,962 total customer trials in 2009." (Presentation materials from February 17,2010, meeting, p. 6.) Please provide documents that form the basis of this claim.*

The number 6,135,962 is based on the data submitted to the FTC in prior submissions. To arrive at this figure, each customer purchase is counted as a single sale. In prior data, additional sales to the same customer were represented as a new sale. That is why this number is lower than the figures submitted in the prior submissions. A document organizing the prior data in this manner is contained on JTM-CD 00003 for your convenience.

*16. Your clients state: "Immediately after ordering consumers receive an email with the details of their order and cancellation information." (Compliance Overview Presentation, December 15,2009, p. 20 of Marketing Practices section) Has this email procedure always been company policy? If not, please explain how long the email procedure has been in effect, who was responsible for creating this procedure, whether there have been any changes in the email procedure, and the reasons for instituting this procedure and making changes to it.*

JTM sent email receipts with purchase information and customer service contact information along with the material offer details. Unfortunately, JTM is not able to identify exactly when the practice began or to which offers it pertained. JTM has recently changed the receipts to include the complete terms and conditions at the bottom of the message. Depending on the offer, the email receipt was created by Sameer Ahmed, Jeff Penner or Nolan Smits and approved by Jesse Willms.

*17. Your clients state: "Consumers must consent to our terms before purchasing." (Compliance Overview Presentation, December 15, 2009, p. 28 of Marketing Practices section) Please explain the procedure by which consumers provide their "consent" to the purchase. Has this consent procedure always been company policy? If not, please explain how long the consent procedure has been in effect, who was responsible for creating this procedure, whether there have been any changes in the consent procedure, and the reasons for instituting this procedure and making changes to it.*

JTM submitted this information to you in response to your original Request No.

19. JTM discloses the terms and conditions in a manner which it believes is clear and conspicuous repeatedly on the websites, including on the billing pages. Consumers consent by affirmatively clicking on the button next to the payment information to execute the transaction.

*18. Your clients state: Copyrighters and designers must review and understand the "compliance guide," and the quality assurance team and managers review websites to ensure that the compliance guide is being followed. (Compliance Overview Presentation, December 15, 2009, p. 31 of Marketing Practices section) Please provide a complete copy of each version of the compliance guide. In addition, please state who was responsible for creating this guide, how long the guide has been in effect, whether there have been any changes to the guide, who was responsible for making the changes, and the reasons for creating the guide and making changes to it.*

The compliance guide was created by Szymon Kiedyk with the assistance of Hernan Ortegon and was finalized on December 3, 2009. Jesse Willms reviewed and approved it. All employees provide revision recommendations to the guide which are ultimately reviewed and approved by Jesse Willms. A copy of the compliance guide is provided on JTM-CD 00003.

The guide was created as a general compliance outline for all employees, as well as a guideline for designers and content writers. The compliance guide is one of many measures in place to ensure that all content created at JTM is compliant.

*19. Your clients state: "They [call center agents] are professionally trained for customer service using the script provided to them by JTM. They deal with customer inquiries, cancellations, refund information, and solutions." (Compliance Overview Presentation, December 15, 2009, p. 2 of Call Centers section; see also Customer Service section, pp. 4-8) Please provide copies of each version of the scripts that are given to the call centers and any other materials (including, but not limited to, training materials) that are used in connection with the call centers, in addition, please state who was responsible for creating the each script, training material, and other material, how long each script, training material, and other material has been used, whether*

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*there have been any changes to the scripts, training materials, and other materials, who was responsible for making the changes, and the reasons for making changes to them.*

Responsive information is attached hereto as JTM 10166-10404.

*20. Your clients state: "Any changes to the scripting or websites is brought to the attention of the Customer Service Agents..." and "Agents are constantly updated on new protocols." (Compliance Overview Presentation, December 15, 2009, p. 3 of Call Centers section) Please state who is responsible for making changes to the scripting or websites, or creating new protocols, who notifies Customer Service Agents of such changes, and describe the method by which such changes are communicated to the Customer Service Agents. In addition, please provide any documents that refer to or discuss changes to scripts, websites, or new protocols.*

Barbara Newell and Nancy Carr are responsible for making changes to the scripts. Jesse Willms and Hernan Ortegon review and approve all scripts. All website changes are approved by Jesse Willms and implemented by the design team.

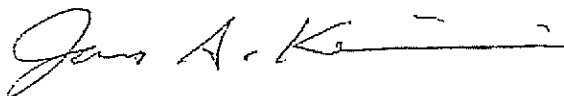
*21. Your clients state: "Customers located in the following regions will not qualify for a trial: Zip codes 79754, 56583, and 74457." (Compliance Overview Presentation, December 15, 2009, p. 9 of Marketing Practices section) Please explain what geographic regions are covered by these zip codes, the reason why customers in those regions will not qualify for a trial, when this policy went into effect, and who was responsible for instituting this policy.*

These zip codes did not qualify for many of JTM's products. Among other criteria, they were excluded due to their low population and shipping access difficulties. The policy was implemented by Mark Adamson.

\*\*\*

This information is provided to the FTC voluntarily. JTM reserves all rights it may have to proceed in this matter. This letter does not constitute a waiver of any of those rights or an admission of any kind.

Sincerely,



James A. Kaminski

cc: Sean Moynihan, Esq.  
Klein Zelman Rothermel LLP

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Company Name	Trade Name	Address	Nature of Relationship	Officers/Directors	Stockholders and Percentages of Ownership	Date of Incorporation/Registration
1016363 Alberta Ltd. 1021018 Alberta Ltd						
	Just Think Media Credit Report America eDirect Software Wulongsource Wuyi Source	#2500, 10104 103Avenue Edmonton, AB #2500, 10104 103Avenue Edmonton, AB #2500, 10104 103Avenue Edmonton, AB #204 85 Canford Way Edmonton, AB #2500, 10104 103Avenue Edmonton, AB 11 Altabarcan Avenue Suite 240 Sherwood Park, AB	Registered partner of Just Think Media Registered partner of Just Think Media Tradename partnership of 1016363 Alberta Ltd and 1021018 Alberta Ltd. Tradename registered under 1021018 Alberta Ltd. For sale of credit report product Tradename partnership of 1016363 Alberta Ltd and 1021018 Alberta Ltd. Tradename operated by 1021018 Alberta Ltd. For sale of tea. Tradename operated by 1021018 Alberta Ltd. For sale of tea.	Jesse Williams Jesse Williams Jesse Williams Jesse Williams Jesse Williams Jesse Williams	100% 100% 100% 100% 100% 100%	12/8/2002 12/9/2002 12/3/2008 4/14/2009 6/15/2005 3/30/2007 5/23/2007
Coastwest Holdings Ltd.		Vasilisis Frederiksis, 33, 1st floor Nicosia, Cyprus	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	Jesse Williams	100%	3/13/2007
JD Media Corp.		1802 N Carson St, Suite 108-3705 Carson City, NV	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	Jesse Williams	100%	4/23/2009
JD Media Group Inc.	Delaware		Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	Jesse Williams	100%	2009
JTM1 Media Ltd Software Wholesale Direct		P.O. Box 642 642 Main Street Charlestown, Newis Unit 3 15-17 Caledonian Road P.O. Box 258 London UK #2500, 10104 103Avenue Edmonton, AB	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation. Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	Jesse Williams Jesse Williams	100% 100%	4/24/2009 5/23/2006
Gillmap Limited		9 Broomhill, Stanley, DH9 8AZ, Durham	Company set up for the sale of software. No activity.	Jesse Williams	100%	
Besiana Services Ltd.		NA	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	NA	NA	NA
Morgana Investments Corp.		NA	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	NA	NA	NA
Genta Holdings		NA	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	NA	NA	NA
Rivierco Trading Ltd		3 Athinodorou Street, 2025 Dasoupoli, Strovolos Nicosia	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	NA	NA	NA
Farend Services Ltd.		3 Athinodorou Street, 2025 Dasoupoli, Strovolos Nicosia	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	NA	NA	NA
Pasche Marketing Inc.		501 Tyson Center, Pearl Drive Ottigas Centre, Pasig	Company set up to assist JTM with the securing of Merchant and Bank accounts as International Merchants/Banks did not want to deal with Canadian Corporation.	NA	NA	NA

<b>MONTH</b>	<b># INITIAL SALES</b>
<b>ACAI</b>	
Jan,2009	159832
Feb,2009	90049
March,2009	79714
April,2009	80529
May,2009	67421
June,2009	38407
July,2009	84496
Aug,2009	47611
Sep,2009	60553
Oct,2009	97735
Nov,2009	65516
Dec,2009	2056
Jan,2010	2096
<b>TOTAL</b>	<b>876015</b>
<b>CRA</b>	
Jan,2009	34005
Feb,2009	12342
March,2009	16534
April,2009	17091
May,2009	11724
June,2009	0
July,2009	0
Aug,2009	0
Sep,2009	363
Oct,2009	101
Nov,2009	0
Dec,2009	2
<b>TOTAL</b>	<b>92162</b>
<b>DAZZLE</b>	
April, 2009	17
May, 2009	36953
June, 2009	71131
July, 2009	112064
Aug, 2009	85634
Sep, 2009	131285
Oct, 2009	152729
Nov, 2009	102342
Dec,2009	3913
Jan,2010	3836
<b>Total</b>	<b>699904</b>
<b>LIFTCREAM</b>	
April, 2009	74
May, 2009	1923
June, 2009	1128

July, 2009	5258
Aug, 2009	2129
Sep, 2009	1531
Oct, 2009	2785
Nov, 2009	2316
Dec, 2009	0
Jan, 2010	4
<b>Total</b>	<b>17148</b>

<b>MakeMoney</b>	
Jan, 2009	138407
Feb, 2009	42952
Mar, 2009	38566
Apr, 2009	6759
May, 2009	7119
Jun, 2009	91
Jul, 2009	0
Aug, 2009	0
Sep, 2009	14535
Oct, 2009	60590
Nov, 2009	77009
Dec, 2009	2237
Jan, 2010	9455
<b>TOTAL</b>	<b>397720</b>

<b>PureCleanse</b>	
Jan, 2009	3009
Feb, 2009	8519
Mar, 2009	21834
Apr, 2009	15465
May, 2009	11213
Jun, 2009	1117
Jul, 2009	5807
Aug, 2009	5174
Sep, 2009	6367
Oct, 2009	9409
Nov, 2009	5065
Dec, 2009	124
Jan, 2010	389
<b>TOTAL</b>	<b>93492</b>

<b>ResV</b>	
Mar, 2009	19
Apr, 2009	147
May, 2009	398
June, 2009	37
July, 2009	2649
Aug, 2009	1782
Sep, 2009	2375

2

Oct, 2009	1827
Nov, 2009	628
Dec, 2009	0
Jan, 2010	4
<b>TOTAL</b>	<b>9866</b>

<b>VibrantSmileKit</b>	
Dec, 2009	60
Jan, 2010	18436
<b>TOTAL</b>	<b>18496</b>

<b>Wu-Yi</b>	
Jan, 2009	46401
Feb, 2009	31952
Mar, 2009	11931
Apr, 2009	6191
May, 2009	5915
Jun, 2009	239
Jul, 2009	83
Aug, 2009	0
Sep, 2009	0
Oct, 2009	0
Nov, 2009	0
Dec, 2009	2
<b>TOTAL</b>	<b>102714</b>

<b>GRAND TOTAL</b>	2307517
--------------------	---------

Main Offer Total Sales	2307517
Upsells Total Sales	127325
E-Books Total Sales	3701120

<b>Total Initial Sales</b>	<b>6,135,962.00</b>
----------------------------	---------------------

5



**1016363 ALBERTA LTD.****Statement of Earnings and Retained Earnings****Year Ended November 30, 2008***(Unaudited - See Notice To Reader)*

	2008	2007
<b>REVENUE</b>		
Share of earnings of eDIRECTSoftware	\$ 616,033	\$ 402,624
<b>EXPENSES</b>		
Salaries and benefits	214,021	-
Professional fees	2,707	3,016
Interest and bank charges	216	60
	<u>216,944</u>	<u>3,076</u>
<b>EARNINGS BEFORE INCOME TAXES</b>	399,089	399,548
<b>INCOME TAXES</b>	<u>56,524</u>	<u>65,240</u>
<b>NET EARNINGS</b>	342,565	334,308
<b>RETAINED EARNINGS - BEGINNING OF YEAR</b>	<u>427,590</u>	<u>93,282</u>
<b>RETAINED EARNINGS - END OF YEAR</b>	<u>\$ 770,155</u>	<u>\$ 427,590</u>

**1021018 ALBERTA LTD.****Statement of Earnings and Retained Earnings****Year Ended November 30, 2008***(Unaudited - See Notice To Reader)*

	2008	2007
<b>REVENUE</b>		
Share of earnings of eDIRECTSoftware	\$ 1,848,100	\$ 1,207,871
Interest	35,814	-
	<u>1,883,914</u>	<u>1,207,871</u>
<b>EXPENSES</b>		
Salaries and benefits	1,880,105	1,207,632
Professional fees	3,176	2,847
Interest and bank charges	222	388
Office	-	56
	<u>1,883,503</u>	<u>1,210,923</u>
<b>EARNINGS (LOSS) BEFORE INCOME TAXES</b>	411	(3,052)
<b>INCOME TAXES</b>	-	237
<b>NET EARNINGS (LOSS)</b>	411	(3,289)
<b>RETAINED EARNINGS - BEGINNING OF YEAR</b>	<u>130,959</u>	<u>194,248</u>
<b>DIVIDENDS PAID</b>	131,370	190,959
	-	(60,000)
<b>RETAINED EARNINGS - END OF YEAR</b>	<u>\$ 131,370</u>	<u>\$ 130,959</u>

**eDIRECT - JUST THINK MEDIA**  
**Income Statement 01/01/2008 to 12/31/2008**

Page 1

**REVENUE**

**INCOME**

REVENUE - Advantant	1,577.31
REVENUE - RAPID PORTAL - P...	30,074.01
REVENUE - First Action	32,392.70
REVENUE - Enhancement Cons...	62,728.03
REVENUE - BCM Direct	137,369.92
REVENUE - iLINK	903,626.45
REVENUE - iWORKS	5,851,478.46
SALES - Canada	11,904,285.46
SALES - USA, UK and AUS	90,397,338.86
ACCRUED REVENUE	0.00
****UNALLOCATED REVENUE***	0.00

**TOTAL INCOME** 109,420,871.20

**TOTAL REVENUE** 109,420,871.20

**EXPENSE**

**DIRECT COSTS**

Accrued Direct Expenses	0.00
ADVERTISING and MARKETING	51,360,104.37
CASUAL LABOUR	150.00
DISTRIBUTORS' FEES	3,433,469.08
FREIGHT IN	171,302.22
FREIGHT OUT	12,016,283.24
PURCHASES FOR RESALE	4,569,098.30
RESEARCH and MARKETING	47,913.34
SHIPPING SUPPLIES, INSERT...	819,746.41
TECHNICIANS and MONITORS	4,716,339.91
VEHICLES	0.00
WCB EXPENSE	665.81

**TOTAL DIRECT COSTS** 77,135,072.66

**ADMINISTRATIVE EXPENSES**

ACCOUNTING / ADMINISTRATI...	80,064.02
ADVERTISING / RECRUITMENT	1,053.62
ALLOWANCE FOR RETURNS	4,407,573.16
AMORTIZATION EXPENSE	6,704.85
CHARITABLE DONATIONS	254.18
COLLECTION FEES	1,060.66
COLLECTION FEES - ACH Direct	0.00
COLLECTION FEES - Litta	5,181,849.85
COLLECTION FEES Merchant e...	0.00
COLLECTION FEES - Optimal	0.00
COLLECTION FEES - Netpaying...	0.00
COLLECTION FEES - Paygea	1,328,671.91
COLLECTION FEES - Paygea B...	0.00
COLLECTION FEES - Verifi	0.00
COLLECTION FEES - Visa / Ma...	9,353.73
COLLECTION FEES - PPS/Gate...	0.00
COLLECTION FEES - ASSERTI...	0.00
COLLECTION FEES - WIRECA...	0.00
CONDO FEES	0.00
CONSULTING FEES	102,153.88
CONSULTING FEES - USA	0.00
CPP Expense	0.00
EMPLOYEE INCENTIVES	0.00
DEPRECIATION	0.00
EI Expense	0.00
EMPLOYEE BENEFITS	0.00
EXCHANGE GAIN / LOSS	0.00
GOVERNMENT PENALTIES / I...	0.00
INTEREST and BANK CHARGES	19,531.80

Printed On: 03/10/2010

JTM 10151

**eDIRECT - JUST THINK MEDIA**  
**Income Statement 01/01/2008 to 12/31/2008**

Page 2

LEGAL FEES	217,111.16
LICENSES and PERMITS	0.00
MEALS and ENTERTAINMENT	8,599.40
MEALS and ENTERTAINMENT- ...	980.43
MISCELLANEOUS	1,003.81
OFFICE	29,043.56
PAYROLL EXPENSES	1,453,443.41
PHONES, FAX, INTERNET	530,705.11
RENT	41,505.80
SECURITY	4,267.20
TRAINING and RECRUITMENT	0.00
TRAVEL	64,279.40
UTILITIES	3,631.00
WEB DESIGN	0.00
<b>TOTAL ADMINISTRATIVE</b>	<b>13,480,941.85</b>
<b>OTHER INCOME and EXPENSES</b>	
INTEREST EARNED	-127.48
EXTRAORDINARY EXPENSE	276,389.50
<b>TOTAL OTHER INCOME and E...</b>	<b>276,242.02</b>
<b>TOTAL EXPENSE</b>	<b>90,902,258.53</b>
<b>NET INCOME</b>	<b>16,518,614.87</b>

Printed On: 03/10/2010

JTM 10152

**eDIRECT - JUST THINK MEDIA**  
**Income Statement 01/01/2009 to 12/31/2009**

Page 1

**REVENUE**

**INCOME**

REVENUE - RAPID PORTAL - P...	39,200.57
REVENUE - Enhancement Cons...	105,853.21
REVENUE - BCM Direct	20,303.80
REVENUE - ILINK	162,129.61
SALES - Canada	18,423,741.68
SALES - USA, UK and AUS	208,239,405.71
<b>TOTAL INCOME</b>	<b>224,990,834.66</b>

**TOTAL REVENUE**

**224,990,834.66**

**EXPENSE**

**DIRECT COSTS**

ADVERTISING and MARKETING	123,141,838.93
CASUAL LABOUR	1,315.00
DISTRIBUTORS' FEES	9,251,685.56
FREIGHT IN	197,924.38
FREIGHT OUT	6,953,293.27
PURCHASES FOR RESALE	10,284,810.66
RESEARCH and MARKETING	20,283.35
SHIPPING SUPPLIES, INSERT...	893,718.95
TECHNICIANS and MONITORS	18,578,703.65
WCB EXPENSE	87.02
<b>TOTAL DIRECT COSTS</b>	<b>167,323,428.97</b>

**ADMINISTRATIVE EXPENSES**

ACCOUNTING / ADMINISTRATI...	158,045.50
ADVERTISING / RECRUITMENT	21,528.13
COLLECTION FEES	98,487.11
COLLECTION FEES - ACH Direct	68.21
COLLECTION FEES - Lilla	2,371,608.41
COLLECTION FEES Merchant e...	755,786.50
COLLECTION FEES - Optimal	16,328,112.39
COLLECTION FEES - Netpaying...	437,039.34
COLLECTION FEES - Paygea	15,650,225.11
COLLECTION FEES - Paygea B...	2,886,625.40
COLLECTION FEES - Verifi	3,308.50
COLLECTION FEES - PPS/Gata...	1,702,525.88
COLLECTION FEES - ASSERTI...	48,227.86
COLLECTION FEES - WIRECA...	420,748.84
CONDO FEES	9,925.73
CONSULTING FEES	112,227.20
CONSULTING FEES - USA	81,834.27
CPP Expense	15,870.23
EMPLOYEE INCENTIVES	1,929.64
EI Expense	7,881.33
EMPLOYEE BENEFITS	8,473.58
EXCHANGE GAIN / LOSS	92,770.64
INTEREST and BANK CHARGES	146,412.53
LEGAL FEES	970,250.62
LICENSES and PERMITS	30.00
MEALS and ENTERTAINMENT	37,740.49
MEALS and ENTERTAINMENT- ...	4,150.18
MISCELLANEOUS	2,549.28
OFFICE	78,238.02
PAYROLL EXPENSES	2,288,421.87
PHONES, FAX, INTERNET	775,321.20
RENT	158,289.28
SECURITY	1,704.89
TRAINING and RECRUITMENT	100.00
TRAVEL	365,233.19
UTILITIES	4,797.43

Printed On: 03/10/2010

JTM 10153

**eDIRECT - JUST THINK MEDIA**  
**Income Statement 01/01/2009 to 12/31/2009**

Page 2

WEB DESIGN	19,131.86
TOTAL ADMINISTRATIVE	<u>46,037,397.84</u>
TOTAL EXPENSE	<u>213,360,826.61</u>
NET INCOME	<u><u>11,629,808.05</u></u>

Printed On: 03/10/2010

JTM 10154

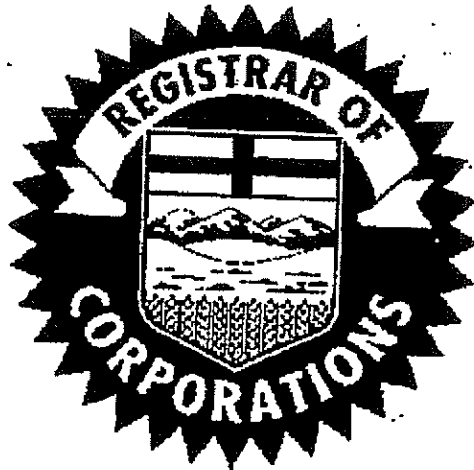
CORPORATE ACCESS NUMBER: 2010210181

**Alberta**

BUSINESS CORPORATIONS ACT

**CERTIFICATE  
OF  
INCORPORATION**

1021018 ALBERTA LTD.  
WAS INCORPORATED IN ALBERTA ON 2002/12/09.



JTM 10155

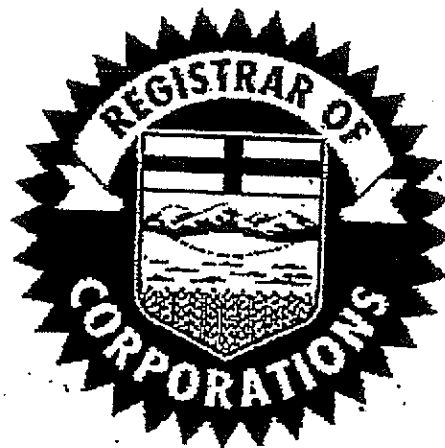
CORPORATE ACCESS NUMBER: 2010163638



BUSINESS CORPORATIONS ACT

**CERTIFICATE  
OF  
INCORPORATION**

**1016363 ALBERTA LTD.  
WAS INCORPORATED IN ALBERTA ON 2002/12/08.**



JTM 10156



ISLAND OF NEVIS  
OFFICE OF THE REGISTRAR OF COMPANIES

*CERTIFICATE OF INCORPORATION*

I HEREBY CERTIFY that

*JDW Media Inc*

is duly incorporated and has filed articles of incorporation under the provisions of  
the Nevis Business Corporation Ordinance 1984, as amended, on

*24th April, 2009*

Given under my Hand & Seal at Charlestown  
This *24th* day of *April*, 2009

  
Registrar of Companies

JNLh4bZi

No. C 35602

JTM 10157



A

**CERTIFICATE OF INCORPORATION  
OF A PRIVATE LIMITED COMPANY**

Company No. 6921840

The Registrar of Companies for England and Wales hereby certifies that  
**JTMJ MEDIA LTD**

is this day incorporated under the Companies Act 1985 as a private  
company and that the company is limited.

Given at Companies House, Cardiff, the 2nd June 2009



THE OFFICIAL SEAL OF THE  
REGISTRAR OF COMPANIES

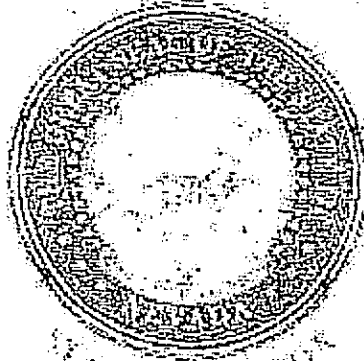


**Companies House**  
— for the record —

The above information was communicated in non-legible form and authenticated by the  
Registrar of Companies under section 710A of the Companies Act 1985.

JTM 10158

# SECRETARY OF STATE

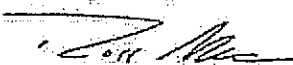


## CORPORATE CHARTER

I, ROSS MILLER, the duly elected and qualified Nevada Secretary of State, do hereby certify that JD MEDIA, CORP., did on April 23, 2009, file in this office the original Articles of Incorporation; that said Articles of Incorporation are now on file and of record in the office of the Secretary of State of the State of Nevada, and further, that said Articles contain all the provisions required by the law of said State of Nevada.



IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Great Seal of State, at my office on April 24, 2009.

  
ROSS MILLER  
Secretary of State

Certified By: Nita Hibshman  
Certificate Number: C20090423-1769

JTM 10159

ΚΥΠΡΙΑΚΗ  
REPUBLIC



ΔΗΜΟΚΡΑΤΙΑ  
OF CYPRUS

HE 194251

HE 44

THE COMPANIES LAW, CAP. 113

Section 15(1)

**CERTIFICATE OF INCORPORATION**

IT IS HEREBY CERTIFIED that,

**COASTWEST HOLDINGS LIMITED**

has this day been Incorporated under the Companies Law, Cap. 113 as a Limited  
Liability Company.

Given under my hand in Nicosia on the 13th of March, 2007

(Sgd) E. B. KOKKINOS

Registrar of Companies

TRANSLATED TRUE COPY

(Sgd) P. EPIPHANIOU  
for Registrar of Companies

14 March, 2007

JTM 10160

**REGISTER TRADE NAME - Proof of Filing**

**Alberta Registration Date: 2008/12/03**

**Registration Number: TN14408645**

**Service Request Number: 12432191**

**Trade Name: JUST THINK MEDIA**

**Type of Business: ECOMMERCE MARKETING AGENCY**

**Business Location: ALBERTA**

**Commencement Date: 2008/07/01**

**Declarant**

**Status: Active**

**Declarant Type: Legal Entity**

**Corporate Access Number: 2010210181**

**Last Name / Legal Entity Name: 1021018 ALBERTA LTD.**

**Street: #2500, 10104 - 103 AVENUE**

**City: EDMONTON**

**Province: ALBERTA**

**Postal Code: T5J 1V3**

**Registration Authorized By: SCOTT R. TILLEY  
SOLICITOR**

# REGISTER TRADE NAME - Proof of Filing

Alberta Registration Date: 2009/04/14

Registration Number: TN14632780

Service Request Number: 12987857

Trade Name: CREDIT REPORT AMERICA

Type of Business: ECOMMERCE - CONSUMER GUIDE ON CREDIT RATINGS

Business Location: ALBERTA

Commencement Date: 2009/01/01

---

## Declarant

Status: Active

Declarant Type: Legal Entity

Corporate Access Number: 2010210181

Last Name / Legal Entity Name: 1021018 ALBERTA LTD.

Street: #2500, 10104 - 103 AVENUE

City: EDMONTON

Province: ALBERTA

Postal Code: T5J 1V3

Registration Authorized By: SCOTT R. TILLEY  
SOLICITOR



# Trade Name / Partnership Search Corporate Registration System

Date of Search: 2006/07/26  
Time of Search: 10:31 AM  
Search provided by: 476393 ALBERTA LTD.

Service Request No: 8939833  
Customer Reference No:

Registration No: PT11768397  
Current Business Name: EDIRECTSOFTWARE  
Status of Business Name: Active  
Trade Name / Partnership Type: Partnership  
Commencement Date: 2005/01/01 YYYY/MM/DD  
Date of Registration: 2005/06/15 YYYY/MM/DD  
Type of Business: SOFTWARE RESELLER

Current Partners:

# HUGHES & BENTZEN, PLLC

ATTORNEYS AT LAW  
1100 CONNECTICUT AVENUE, NW  
SUITE 340  
WASHINGTON, DC 20036

(202) 293-8975 (202) 659-3340  
FACSIMILE (202) 293-8973  
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STUART H. SORKIN, P.C., FL, DC \*  
CHRISTOPHER WHEELER, DC, MD

OF COUNSEL  
BRUCE S. DEMING, DC, VA\*

OTHER OFFICES:  
ROCKVILLE, MARYLAND

June 4, 2010

\*NOT ADMITTED IN MARYLAND

Kathryn C. Decker  
Federal Trade Commission  
915 Second Ave., Ste. 2896  
Seattle, WA 98174

Dear Casey:

This letter contains JTM's response to your April 19, 2010 additional request for information. On a preliminary note, you requested a written confirmation as to JTM's current business practices. That confirmation is attached to this letter as JTM-I 00028 - 00029. The responses to your supplemental requests follow.

***1. Specs. #1 & #17: Corporations. The information provided in JTM-CD 00002 is different than that produced in your January 29<sup>th</sup> submission. We would like clarification on the following:***

- a. JD Media Group Inc. was previously listed as being a Canadian corporation located at 11 Athabasca Ave., Sherwood Park, AB. It is now listed as being a Delaware corporation. Please provide the correct incorporation information and the complete current address for this company. We note that we were unable to find a registered Delaware corporation with this name and you did not provide us with a certificate of incorporation.***

The Delaware registration information is attached as JTM-I 00030. The business has the physical address of 85 Cranford Way #204, Sherwood Park, AB T8H 0H9.

- b. JDWMedia LLC was previously listed as a U.S. company located at 2184 Channing Way, Idaho Falls, ID. It is no longer on the list. Please explain this omission.***



This omission constitutes an error made in good faith. The address listed previously is correct.

***c. Brackenfore Ltd was previously listed as a U.K. company located at 17 Cleadon St., Durham, U.K. It is no longer on the list. Please explain this omission.***

JTM thoroughly researched the questions you posed related to corporate status. It appears that JTM misunderstood your earlier requests and that a correction is in order. Mr. Willms and JTM have no ownership interest in several entities that appeared on the charts. Rather, the affiliation is that those entities served as agents of JTM. The agency relationship was necessary to facilitate credit card processing. As discussed in greater detail later in this response, there are no written contracts associated with these services. This is also the reason why JTM possesses no incorporation documents related to these entities. This explanation is provided to you as a clarification made in good faith.

***d. Colesdale Ltd was previously listed as being a U.K. company located at 11 Stormont St., Durham, U.K. It is no longer on the list Please explain this omission.***

Please see the explanation provided in Supplemental Response No. 1(c).

***e. You indicated that no addresses were available for Besiana Investments Ltd (also referred to as Besiana Services Ltd - Cyprus), Morgana Investments Ltd (also referred to as Morgana Investments Corp. - Cyprus); and Genta Holdings Ltd (also referred to as Genta Holdings - Cyprus). Company websites have included addresses for these entities. Please provide these addresses or explain why none are available.***

***In addition, please provide officer/owner information for Besiana Investments Ltd, Morgana Investments Ltd, Gillmap Ltd, Genta Holdings Ltd, Rivierico Trading Ltd, Farend Services Ltd, and Pasche Marketing Inc., or explain why none is available (especially since officer/owner information was provided for another company incorporated in Cyprus, i.e., CoastWest Holdings Ltd).***

Please see the explanation provided in Supplemental Response No. 1(c).

***f. Please confirm the correct addresses for 1021018 Alberta Ltd (previously listed as 19 Charlton Road) and WuYi Source (previously listed as 10103 103<sup>rd</sup> Avenue).***

The original registered address for 1021018 Alberta, Ltd. was 79 Charlton Road. The original address for WuYi Source was 10103 103 Avenue. Both businesses have a current legal address of 10104 103 Avenue #2500, Edmonton, Alberta. This is the

address of the office of JTM's corporate lawyer. Both businesses have a physical business address of 85 Cranford Way #204, Sherwood Park, AB T8H 0H9.

***g. There are several websites that list three different U.K. companies as the "contact:" Ablemill Ltd; Shinemill Ltd; and Rook Investments Ltd. None of these companies were listed in your responses to Specs. #1 & #17. They appear, however, to be connected to Jesse Willms as each website also lists 2184 Channing Way #322, Idaho Falls, ID address and/or Farend Services Ltd. Please provide the requested information and copies of websites for each of these companies.***

Please see the explanation provided in Supplemental Response No. 1(c).

***2. Spec. #4: Sales for 2007-2008. The information provided in JTM-CD 00002 is unclear/incomplete. The specification asked for total sales broken down by month and year and by dollar amount. It appears the figures your clients provided are just the total number of transactions.***

***For example, in Spec. #4, Acai has "1" listed for September 2008, and PureCleanse has "2" listed for December 2008. Spec. #6, however, shows these numbers as the number of sales, not dollar figures (AcaiBurn, 1 transaction for \$4.95; PureCleanse, 2 transactions for total of \$9.90). Please provide the dollar amounts for 2006-2008 as requested in Spec. #4. In addition, it would be helpful if you could break down sales by country and by year.***

This response confirms what we discussed in our telephone conversation regarding this subject. The information was indeed contained on the spreadsheet contained on JTM-CD 00002, but required additional manipulation within the spreadsheet to render it visible. While preparation of this response was underway, you requested that the format of the transaction data mirror the formatting presented on JTM-I 00010-00013. JTM is currently organizing the data in that manner and will submit it to you subsequently.

***3. Spec. #6(6) Purchases under new business model. Please provide the number of customers who have paid for a membership in the buyers club and the total dollar amounts paid. How many of these customers buy the "optional" mouth tray under the new model?***

The volume of sales under this business model has been low. JTM reports that filtering out transactional information about the new sales is difficult. JTM is actively working to identify these records and will provide them as soon as they are available.

4. **Specs. #9 & #11: Fulfillment companies/suppliers.** *The responses provided for Specs. 9 and 11 on JTM CD 00002 are identical lists, both labeled "vendors." Thus, it appears you have combined the list for your fulfillment companies with that of your suppliers. Is this correct?*

*The responses to Specs. #9 and #11, however, differ from those you provided in the January 29<sup>th</sup> submission. Is JTM CD 00002 intended to supersede the lists provided in the January 29<sup>th</sup> letter? Or are the vendors listed in JTM CD 00002 limited to current vendors? Please provide a clarification of these differences.\**

*\* Examples of differences include: (1) AtLast International (U.K.), RDP (ON), EDS AUS, EDS (IA), and Earth's Creation USA Inc. (FL) are not on JTM CD 0002 list; (2) there are different addresses given for AtLast Fulfillment in Denver and Nutricap Labs (NY); and (3) the Ontario, California AtLast Fulfillment office is not on your list.*

Your understanding is correct -- the information contained on JTM-CD 00002 includes both fulfillment companies and suppliers that the company worked with in the past. The list was assembled from JTM's accounting database. The information provided in the January 29 submission represented a then-current list. Therefore, the information provided in both submissions should be reviewed in tandem as both past and current (January 2010) vendors.

5. **Spec. #10: Customer Service/Complaint Handling.** *The information provided is unclear/incomplete. Your clients have advised us that they use a number of call centers to handle customer service issues and customer complaints.*

a. *Please indicate how customer service and complaint calls are split between the various call centers in Oklahoma (GC), Texas (GC), Florida (WeAnswer), California (Live Ops), and Canada (JTM). For example, do some call centers handle only calls for certain hard products (pills, teeth whiteners, etc.)? Do some call centers only handle digital products?*

Live Ops handled all customer service for the pill and teeth whitening products. JTM terminated this contract and hired GC in Texas to perform the work. As the sales volume increased, the Oklahoma division of GC was opened to ensure that call hold times would remain under a minute.

WeAnswer responded to calls regarding the digital products.

JTM is not currently conducting any direct customer service in-house. Nevertheless, occasionally a customer will contact the company directly and any number

of JTM employees may help the customer.

- b. In our February 19<sup>th</sup> letter, we asked that your clients provide the total number of telephone calls customers made to customer service call centers, broken down by year, and any documents discussing or analyzing these consumer communications. This information and documents were not produced. Please provide this information and documents. If possible, please break down the calls by each call center.*

Information responsive to this request was included in JTM's April 13, 2010, and the relevant pages are attached for your convenience as JTM-I 00031 and 00032.

- 6. Spec. #14: Lawsuits/law enforcement actions. The information provided is incomplete. We believe there are at least three other lawsuits in which your clients are named as defendants. Please provide a complete list of all litigation in which your clients have been named.*

*Chamberlain, et al., v. Integraclick, Inc., et al., Case No. 09CA4695 (Circuit Court for the Second Judicial Circuit for Leon County, Florida, Civil Division 12/2/09).*

*Dazzlesmile and Optimal Health Services, LLC v. Epic Advertising, Inc., 1021018 Alberta Ltd., et al., Case No. 2:09-CV-01043-PMW (D. Utah, 11/18/09).*

*Nutricap Labs, LLC v. Just Think Media, Case No. 2:10-cv-01126-LDW-ARL (E.D.N.Y.).*

*Selfhelpworks.com, Inc., v. 1021018 Alberta Ltd., dba Wu Yi Source, iWorks, Jeremy Johnson, and Does 1-25, Case No. 3:10-CV-00172-JAH-JMA (S.D. Cal.).*

*Dr. Mehmet Oz v. FMW Laboratories...JDW Media, LLC, et al., Case No. 09-CV-7297 (S.D.N.Y. 8/12/09).*

*Consumerinfo.com, Inc. v. Jesse Willms, et al., Case No. SACV09-0055 (C.D. Cal. 1/13/09).*

*Okuma Nutritionals, LLC v. eDirectSoftware et al., Case No. 1:07-cv-02010-EWN-BNB (D. Colo. 1997).*

Utah Attorney General.

HUGHES & BENTZEN, PLLC

7. **Spec. #24: Recordings made by customer service companies.** *We would like additional information on the following:*

a. *In your March 5<sup>th</sup> letter, you provided a random sample of 48 wav file recordings from one of the call centers your clients use (JTM CD 00002). Please identify the name of the call center that produced these recordings and the name of the person responsible for assembling the 48 wav files.*

The recordings were produced by Julio Avila, an employee of GC Services.

b. *In your March 12<sup>th</sup> letter, you stated that "JTM initiated an exploratory outbound call program to confirm customers' purchases. This program began in mid-August 2009 and continued through November 2009...For a brief two-month period, one additional product was offered during those follow-up calls. JTM determined that the program was not adding any value to customer satisfaction and terminated the program."*

*Please provide all documents that describe, refer and/or discuss this trial outbound call program, the name of the person who designed the program, the additional product offered during the follow-up calls, which company was responsible for making these calls, and the recordings of these calls.*

This test program was created and carried out by Chris Reinhold, the president of Impulse Marketing, LLC. There are no documents responsive to this request as JTM terminated the contract and has no relationship with the company. JTM is aware that Mr. Reinhold created all scripts used in the program and Impulse Marketing, LLC, was responsible for quality control.

The product offered was a whitening tray. It was marketed to purchasers of the whitening pen. The program was evaluated and it was determined that it was not successful from a business standpoint.

8. **Spec. #25: Contracts with suppliers, affiliates, and service providers.** *The documents provided are incomplete. Our request included, but was not limited to, contracts with providers of: products, fulfillment of customer orders, customer service, customer complaints, and websites or who arrange for websites.*

*Your clients provided contracts with Advalliant, Ad Dynamix, Iworks, Pulse 360.*

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*However, some of the contracts are unsigned or only signed by one person. Please provide the final signed contracts.*

*In addition, your clients' responses to Specs. #9, #10, & #11 list other fulfillment centers, customer service agents, and product suppliers (JTM-I 00004-00006, JTM CD 00002). However, no contracts were supplied for these entities. Please provide the final signed contracts.*

JTM does not possess any additional documents responsive to this request. JTM does not always enter into a signed agreement with its suppliers, ad networks, or other service providers. For example, the parties may prefer to proceed on a pre-paid or week-to-week basis without a written agreement.

9. *Spec. #26: Contracts with providers of advertising services.* *The documents provided are incomplete.*

*Your clients provided contracts with Copeac, Azoogle, eAdvertising/Leadclick, Float, Hydra, Neverblue, Market Leverage, Virtual PDX, Ultra DNS, Peter Graver, My Business Assistant, Live Ops, Regent Group, dba Encore Marketing, International, Electronic Data Systems Corp., Nova Information Systems Canada, and Ceridian Canada Ltd. However, some of the contracts are merely blank forms or are only signed by one person. Please provide the final signed contracts.*

*In addition, your clients' response to Spec. #12 lists other advertising networks (JTM-I 00007). However no contracts were supplied for these entities. Please provide the final signed contracts."(Bloosky, CX Digital, IntegraClick (Clickbooth), ROI Revolution, YEP Network, and SeccoSquared.)*

Please see the response to Supplemental Request No. 8 above.

10. *Spec. #28: Disciplined/terminated employees.* *In response to our request for copies of all records and documents identifying employees who have been reprimanded, sanctioned, or had their employment terminated for any reason, you advised us that your clients believed that they were not permitted to divulge this information to the FTC pursuant to Alberta's Personal Information Protection Act ("PIPA").*

*We have consulted with the Alberta Privacy Commission and been advised that our request fits within a statutory exception to PIPA allowing the disclosure without consent of this information. See PIPA, Part 2, Division 5, Section 20(m). If you have questions about this interpretation, you are invited to contact Jillian Vincent at the*

***Alberta Privacy Commission.***

***However, to ensure that our request is as narrow as reasonably possible, we will modify our request to seek the following: Please provide documents sufficient to identify the name, job title, dates of employment, last known home address, and telephone number(s) (home and cellular) of each person formerly employed by your clients.***

We are still looking into this issue. The representative with whom we spoke at the Alberta Privacy Commission indicated that the issue is less than clear. Nevertheless, Ms. Vincent was out of the office until May 31, 2010. Counsel will follow up with her.

***11. Live Chat sessions. In your March 12<sup>th</sup> letter, you indicated that "JTM instructed the vendor to maintain copies of the chats and it is now doing so. Once such records are amassed, JTM will voluntarily transmit them to the FTC." Please provide these documents as they become available.***

JTM continues to work on the response to this request. The records are difficult to obtain because the products have not been sold in months and the file is apparently very large. JTM will provide them once they are properly discerned.

***12. Cancellation terms. In your March 19<sup>th</sup> letter, you state that "consumers who were not satisfied with the product and wished to receive a refund for their product after the trial period expired were eligible for a full refund under the 60-day money back guarantee." However, in the AcaiBurn.com Frequently Asked Questions document (JTM-I 00015), it states that there is a 30-day guarantee. Please clarify what the time period is for returning products for a refund. If the time period has changed, please provide the date of the change.***

The guarantee currently extends over a period of sixty (60) days. JTM is not aware of the exact date of the change but believes in good faith that it occurred at some point in the fourth quarter of 2009.

***13. Sample products. As discussed previously, we would like samples of the products your clients market. We have the AcaiBurn and Dazzle White products. Please produce the PureCleanse, Resveratrol, Wuyi, Earn Google Cash, Online Cash Success Kit, Quick Profit Kit/Pro, and Success Grants products.***

JTM does not have the product samples readily available as they have not been offered to the public for some time. Nevertheless, JTM continues to attempt to obtain them to fulfill your request.

**14. Digital products. Please describe how consumers obtain information on how to access various websites that feature your digital products/ebooks, the point in time during the sales transaction that this information is conveyed, and whether this process has changed over time. If so, please state when the changes were made.**

Information was presented to consumers on a receipt page displayed after the transactions were completed. Consumers were then sent confirmation e-mails. Information was also available via the customer service number.

**15. Presentation materials from April 13, 2010 meeting. Please identify the underlying documentation used and describe the manner in which your clients prepared the following:**

- a. Pages 3-6, Refunds 2009-2010 for AcaiBurn, DazzleSmile (a.k.a. Dazzle white and Dazzle white Pro), Comprehensive Weight Loss (a.k.a. Online Weight Loss Resources), and Insider Secrets (Insider's Secrets).**

This information was assembled by reviewing data in preparation for the February 17, 2010 submission.

- b. Pages 8-11, Membership Retention for January 2009 for AcaiBurn, Premium White, Comprehensive Weight Loss, and Insider Secrets. In addition, please clarify the meaning of these four pie charts. Is it correct to say that 47-60% consumers (depending on the chart) who became members in January 2009 were still members as of approximately April 13, 2010?**

Yes, it is correct to say that 47-60% of consumers (depending on the chart) who became members in January 2009 were still members as of April 13, 2010.

- c. Page 24, Just Think Media's Member Sites Login Statistics. You state that "A large percentage of customers obtain their logon information from customer service over the phone, through live chat help, or through the brochures that come in the mail."**

JTM arrived at this conclusion by interviewing customer service agents who dealt with customers on a regular basis.

- d. Page 33, Compliance Procedure. Please identify the referenced individuals and their respective companies (i.e., copyrighters, designers, quality assurance team, managers, and external legal team).**

The list of JTM employees was provided as JTM-I 00002. All employees listed are required to take compliance very seriously. As such, they are required to review the

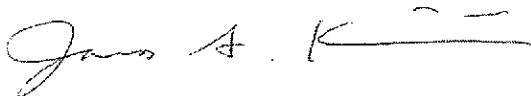


compliance guide and procedures. All employees are encouraged to provide compliance feedback. Jesse Willms conducts a final review of all pages and advertisements that receive consumer traffic and frequently revises them to ensure compliance. Outside law firms, such as Hughes & Bentzen, PLLC, and Klein Zelman Rothermel LLP, provide further guidance on compliance issues.

\*\*\*

JTM wishes to continue to cooperate with the FTC. Nevertheless, JTM reserves all rights it may have in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Kaminski". The signature is fluid and cursive, with a long horizontal stroke at the end.

James A. Kaminski

cc: Sean Moynihan, Esq.  
Klein Zelman Rothermel LLP

HUGHES & BENTZEN, PLLC

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BRUCE S. DEMING, DC, VA\*

OTHER OFFICES:  
ROCKVILLE, MARYLAND

June 4, 2010

\*NOT ADMITTED IN MARYLAND

Kathryn C. Decker  
Federal Trade Commission  
915 Second Ave., Ste. 2896  
Seattle, WA 98174

Dear Ms. Decker:

You requested a written description of the current business practices of Just Think Media ("JTM"). More specifically, you asked for an indication of any changes that may have occurred to JTM's business model as of February 2010. This letter shall serve as JTM's response to your request.

As you are aware, JTM offered goods and services over the internet via trial programs from approximately late 2007 to January 2010. Consumers would need to contact the company if they wished to cancel at the conclusion of the trial period. Beginning in approximately December 2009, JTM began to phase out offering products in that manner. Instead, consumers were offered additional goods and services, but were required to affirmatively opt-in to the subsequent purchase by clicking on a blank click box. By February 2010, products were not offered for sale via trial programs at all.

A brief description of new web sites that JTM has launched or may launch follows:

## **PhoneAgentSource.com**

A reverse phone lookup service is offered on this web site. JTM contracts with third parties to provide the service. JTM does not collect or own any of the phone number data.

There are two options for payment. The first payment method consists of a one-time \$4.95 fee. Consumers may also choose a second option. Consumers

JTM-I 00028

Kathryn C. Decker

June 4, 2010

Page 2 of 2

may try the service for seven days for \$1. If they are pleased with the service after the trial period, they are billed \$18.95 monthly and may cancel at any time.

**PCHealthSolutions.com**

This is an anti-virus program. The customer may choose between a 3, 6 or 12-month membership. Depending on their payment choice, customers are billed a lump sum. The membership does not auto-renew. It should be noted that the company is not promoting this web site in any way and it is receiving very little traffic.

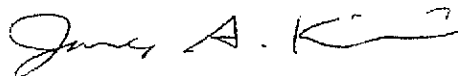
**SwipeBids.com**

This site is a beta site that is currently live. It offers an online auction service. Customers purchase a \$150 membership to participate on a limited basis. Customers who wish to participate and bid on more items may make an additional monthly payment(s). Customers are given the option to automatically pay an additional monthly amount by affirmatively checking an empty click box.

\*\*\*

We hope that this satisfies your request. Please do not hesitate to contact me if you require additional information.

Sincerely,

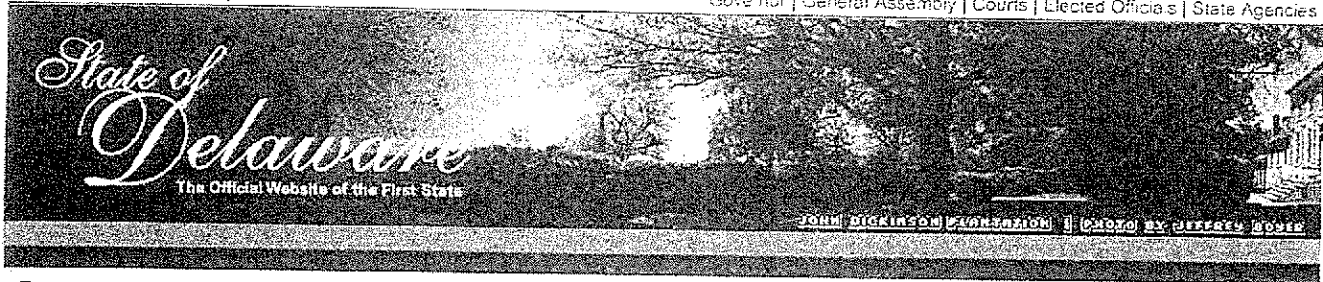


James A. Kaminski

cc: Sean Moynihan, Esq.  
Klein Zelman Rothermel LLP

HUGHES & BENTZEN, PLLC

JTM-I 00029



## Department of State: Division of Corporations

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Request How to  
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Apostilles &  
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## Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number: 4649314 Incorporation Date / 01/27/2009  
Formation Date: (mm/dd/yyyy)

Entity Name: JD MEDIA GROUP, INC.

Entity Kind: CORPORATION Entity Type: GENERAL

Residency: DOMESTIC State: DE

## REGISTERED AGENT INFORMATION

Name: REGISTERED AGENTS OF AMERICA, INC.

Address: 1201 ORANGE ST. SUITE 600

City: WILMINGTON County: NEW CASTLE

State: DE Postal Code: 19801

Phone:

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like ☐ Status ☐ Status, Tax & History Information

[Back to Entity Search](#)

To contact a Delaware Online Agent [click here](#).

JTM-I 00030

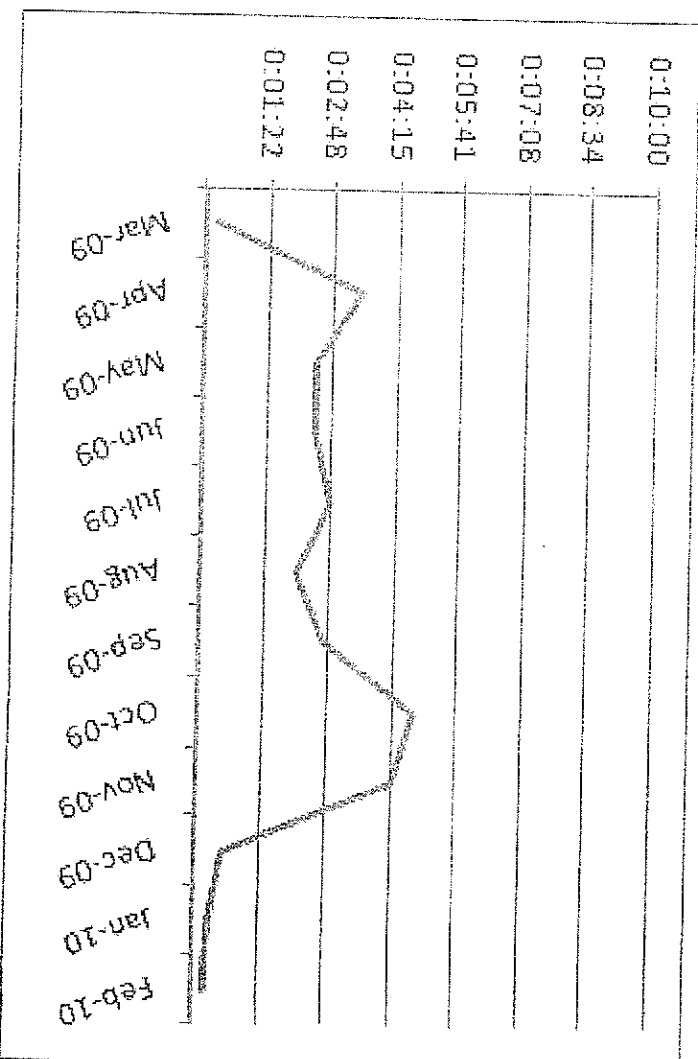
Information as to how many calls to the customer service calls are received, wait times, and any information we have that shows people do not get busy signals but can easily get through.

## Call Times From GC Services

JTM-I 00031

## Time in Minutes

	Calls	Avg Speed of Answer (min)
Mar-09	5660	0:00:14
Apr-09	69320	0:03:27
May-09	147021	0:02:27
Jun-09	180869	0:02:27
Jul-09	186671	0:02:49
Aug-09	191065	0:02:04
Sep-09	205394	0:02:41
Oct-09	244692	0:04:44
Nov-09	293773	0:04:17
Dec-09	243069	0:00:34
Jan-10	121813	0:00:16
Feb-10	26817	0:00:11



## Call Times From WeAnswer

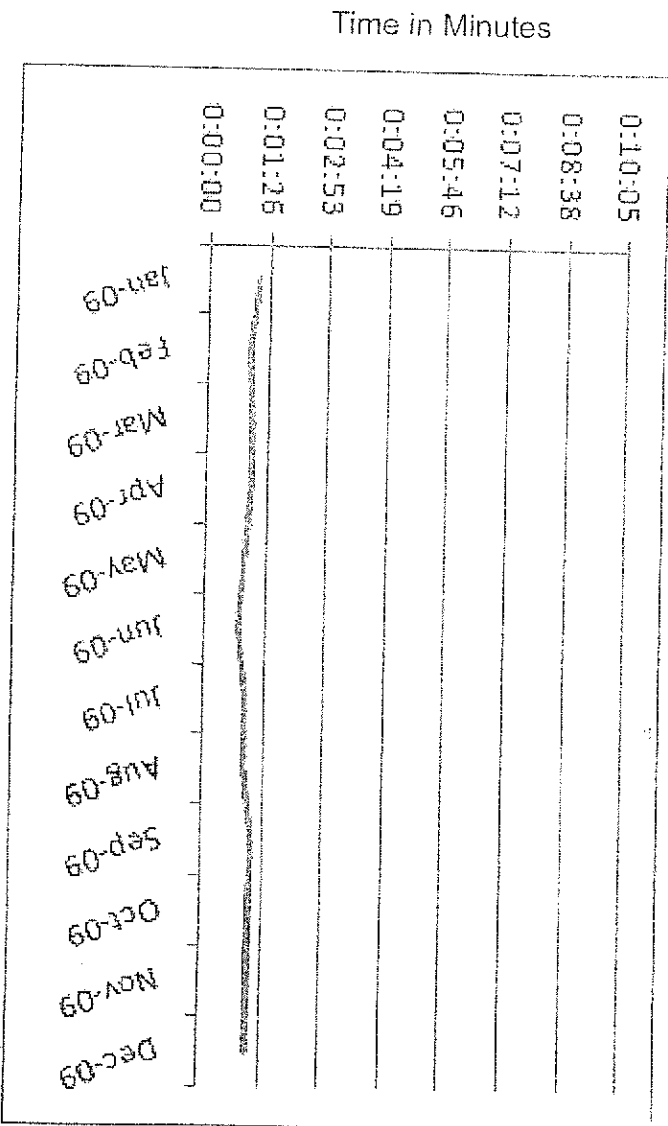
### WeAnswer Call Data

The attached spreadsheet shows calls by month for Calendar Year 2009.

### Hold Times From WeAnswer

	Calls	Avg Speed of Answer (sec)
Jan-09	135903	74
Feb-09	114615	62
Mar-09	145792	64
Apr-09	151497	66
May-09	84550	56
Jun-09	26039	51
Jul-09	87168	62
Aug-09	145565	61
Sep-09	309946	72
Oct-09	292260	70
Nov-09	273218	67
Dec-09	116959	67

Information as to how many calls to the customer service calls are received, wait times, and any information we have that shows people do not get busy signals but can easily get through.



JTM-I 00032

# HUGHES & BENTZEN, PLLC

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OF COUNSEL  
BRUCE S. DEMING, DC, VA\*

OTHER OFFICES:  
ROCKVILLE, MARYLAND

June 7, 2010

\*NOT ADMITTED IN MARYLAND

Kathryn C. Decker  
Federal Trade Commission  
915 Second Ave., Ste. 2896  
Seattle, WA 98174

Dear Casey:

Please find the sales data you requested attached as JTM-I 00033-00037.

Sincerely,



James A. Kaminski

cc: Sean Moynihan, Esq.  
Klein Zelman Rothermel LLP

totalsalestat

MONTH, YEAR TOTAL SALES(USD)

LIFTCREAM

Apr, 2009	\$	436.30
May, 2009	\$	24,055.60
Jun, 2009	\$	94,375.41
Jul, 2009	\$	321,491.18
Aug, 2009	\$	254,256.29
Sep, 2009	\$	334,728.04
Oct, 2009	\$	460,621.90
Nov, 2009	\$	395,783.10
Dec, 2009	\$	294,615.40
Jan, 2010	\$	89,042.25
Feb, 2010	\$	19,757.83

TOTAL \$ 2,289,163.30

RESV

Mar, 2009	\$	253.05
Apr, 2009	\$	892.70
May, 2009	\$	2,209.85
Jun, 2009	\$	8,699.85
Jul, 2009	\$	27,896.81
Aug, 2009	\$	186,162.78
Sep, 2009	\$	221,531.81
Oct, 2009	\$	365,741.19
Nov, 2009	\$	233,859.06
Dec, 2009	\$	128,560.02
Jan, 2010	\$	48,891.84
Feb, 2010	\$	13,547.51
Mar, 2010	\$	6,174.35

TOTAL \$ 1,244,420.82

PCP

Dec, 2008	\$	9.90
Jan, 2009	\$	14,879.70
Feb, 2009	\$	64,839.08
Mar, 2009	\$	683,111.92
Apr, 2009	\$	1,406,298.36
May, 2009	\$	1,048,225.48
Jun, 2009	\$	893,320.84
Jul, 2009	\$	599,629.29
Aug, 2009	\$	581,917.22
Sep, 2009	\$	875,587.44
Oct, 2009	\$	1,090,167.20
Nov, 2009	\$	1,180,722.39
Dec, 2009	\$	711,630.01
Jan, 2010	\$	248,684.05
Feb, 2010	\$	126,904.72
Mar, 2010	\$	571.36

TOTAL \$ 9,526,498.96

CREDITREPORT

Aug, 2008	\$	3,433.03
Sep, 2008	\$	119,727.85
Oct, 2008	\$	293,133.00
Nov, 2008	\$	448,460.80
Dec, 2008	\$	587,313.00
Jan, 2009	\$	651,079.10
Feb, 2009	\$	549,565.70
Mar, 2009	\$	644,378.40



totalsalestat

Apr, 2009	\$	791,457.35
May, 2009	\$	767,704.65
Jun, 2009	\$	1,127.65
Jul, 2009	\$	370,834.34
Aug, 2009	\$	203,188.60
Sep, 2009	\$	10,104.43
Oct, 2009	\$	13,888.14
Nov, 2009	\$	1,756.92
Dec, 2009	\$	2.00

TOTAL	\$	5,457,154.96
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MAKEMONEY

Oct, 2008	\$	666.60
Nov, 2008	\$	213,188.10
Dec, 2008	\$	1,081,096.15
Jan, 2009	\$	3,001,497.15
Feb, 2009	\$	3,068,659.50
Mar, 2009	\$	2,552,540.25
Apr, 2009	\$	1,824,061.00
May, 2009	\$	1,215,257.15
Jun, 2009	\$	22,245.60
Jul, 2009	\$	199,311.59
Aug, 2009	\$	0.00
Sep, 2009	\$	678,611.01
Oct, 2009	\$	3,127,865.21
Nov, 2009	\$	4,975,102.02
Dec, 2009	\$	2,487,543.56
Jan, 2010	\$	1,449,542.32
Feb, 2010	\$	449,484.15

TOTAL	\$	26,346,671.36
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PREMIUMWHITE

Apr, 2009	\$	129.15
May, 2009	\$	117,723.95
Jun, 2009	\$	3,008,445.30
Jul, 2009	\$	7,009,975.08
Aug, 2009	\$	7,553,337.31
Sep, 2009	\$	11,104,265.14
Oct, 2009	\$	16,596,114.17
Nov, 2009	\$	14,054,377.45
Dec, 2009	\$	13,587,014.52
Jan, 2010	\$	3,380,255.18
Feb, 2010	\$	844,161.55
Mar, 2010	\$	247,435.91

TOTAL	\$	77,503,234.71
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WUYI

Sep, 2007	\$	181,900.90
Oct, 2007	\$	1,390,455.30
Nov, 2007	\$	1,759,876.09
Dec, 2007	\$	3,049,670.69
Jan, 2008	\$	4,090,492.58
Feb, 2008	\$	5,336,077.23
Mar, 2008	\$	6,281,497.26
Apr, 2008	\$	6,132,377.93
May, 2008	\$	6,514,917.79
Jun, 2008	\$	6,607,805.93
Jul, 2008	\$	8,413,364.28
Aug, 2008	\$	10,278,814.58
Sep, 2008	\$	11,571,177.02

total sale stat

Oct, 2008	\$	11,333,523.53
Nov, 2008	\$	9,964,538.40
Dec, 2008	\$	8,960,871.39
Jan, 2009	\$	6,541,449.32
Feb, 2009	\$	4,690,096.14
Mar, 2009	\$	3,512,125.16
Apr, 2009	\$	2,065,464.92
May, 2009	\$	1,708,032.84
Jun, 2009	\$	721,761.04
Jul, 2009	\$	2,864.45

TOTAL	\$	121,109,154.77
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ACAI

Sep, 2008	\$	4.95
Oct, 2008	\$	863.97
Nov, 2008	\$	184,316.52
Dec, 2008	\$	2,645,318.33
Jan, 2009	\$	9,209,898.06
Feb, 2009	\$	10,890,000.24
Mar, 2009	\$	8,479,578.09
Apr, 2009	\$	7,829,505.13
May, 2009	\$	8,022,485.85
Jun, 2009	\$	4,904,552.85
Jul, 2009	\$	6,777,645.96
Aug, 2009	\$	7,050,020.41
Sep, 2009	\$	7,387,508.72
Oct, 2009	\$	8,936,588.02
Nov, 2009	\$	9,047,728.47
Dec, 2009	\$	8,404,032.67
Jan, 2010	\$	2,392,801.70
Feb, 2010	\$	743,684.98
Mar, 2010	\$	267,643.37

TOTAL	\$	103,174,178.29
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INSIDER

Jul, 2008	\$	321,334.21
Aug, 2008	\$	612,884.25
Sep, 2008	\$	734,075.10
Oct, 2008	\$	1,082,376.90
Nov, 2008	\$	1,311,730.20
Dec, 2008	\$	1,401,602.40
Jan, 2009	\$	1,540,152.90
Feb, 2009	\$	1,594,518.75
Mar, 2009	\$	1,828,650.15
Apr, 2009	\$	1,917,322.60
May, 2009	\$	1,826,115.80
Jun, 2009	\$	1,073,946.00
Jul, 2009	\$	728,241.84
Aug, 2009	\$	1,449,182.03
Sep, 2009	\$	1,301,697.75
Oct, 2009	\$	997,219.23
Nov, 2009	\$	688,512.32
Dec, 2009	\$	514,035.51
Jan, 2010	\$	335,826.67
Feb, 2010	\$	88,620.49
Mar, 2010	\$	91,305.59

TOTAL	\$	21,439,350.69
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CWL

Jul, 2008	\$	278.60
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totalsalestat

Aug, 2008	\$	558,045.75
Sep, 2008	\$	987,547.45
Oct, 2008	\$	1,536,220.30
Nov, 2008	\$	1,744,712.60
Dec, 2008	\$	2,022,685.75
Jan, 2009	\$	2,269,943.25
Feb, 2009	\$	2,901,002.10
Mar, 2009	\$	2,968,642.20
Apr, 2009	\$	2,736,220.15
May, 2009	\$	2,841,182.70
Jun, 2009	\$	1,995,100.95
Jul, 2009	\$	1,383,125.10
Aug, 2009	\$	2,602,202.73
Sep, 2009	\$	2,550,735.16
Oct, 2009	\$	1,937,854.55
Nov, 2009	\$	1,408,822.59
Dec, 2009	\$	1,095,917.55
Jan, 2010	\$	733,165.84
Feb, 2010	\$	263,323.69
Mar, 2010	\$	114,238.50

TOTAL \$ 34,650,967.51

FRAUDPROTECTION

Oct, 2008	\$	41,134.50
Nov, 2008	\$	147,831.75
Dec, 2008	\$	485,753.40
Jan, 2009	\$	713,448.45
Feb, 2009	\$	934,712.50
Mar, 2009	\$	793,918.95
Apr, 2009	\$	710,154.25
May, 2009	\$	628,825.00
Jun, 2009	\$	16,701.25

TOTAL \$ 4,472,480.05

IDTHEFT

Nov, 2008	\$	119,041.80
Dec, 2008	\$	469,241.85
Jan, 2009	\$	1,088,510.10
Feb, 2009	\$	1,649,341.85
Mar, 2009	\$	1,346,055.90
Apr, 2009	\$	1,142,339.60
May, 2009	\$	983,458.00
Jun, 2009	\$	25,720.75

TOTAL \$ 6,823,709.85

WCF

Oct, 2009	\$	196,946.34
Nov, 2009	\$	2,665,109.76
Dec, 2009	\$	4,279,476.61
Jan, 2010	\$	1,556,182.80
Feb, 2010	\$	361,221.36
Mar, 2010	\$	86.60

TOTAL \$ 9,059,023.47

WRM

Oct, 2009	\$	45,603.56
Nov, 2009	\$	137,987.06
Dec, 2009	\$	89,904.26
Jan, 2010	\$	63,095.00

total sale stat

Feb, 2010	\$	10,894.28
Mar, 2010	\$	7,516.88

TOTAL	\$	355,001.04
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IDVAULT

Oct, 2009	\$	548,770.20
Nov, 2009	\$	718,912.52
Dec, 2009	\$	437,080.45
Jan, 2010	\$	181,437.82
Feb, 2010	\$	59,642.46
Mar, 2010	\$	5,212.20

TOTAL	\$	1,951,055.65
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MOUTHTRAYKIT

Aug, 2009	\$	97,888.92
Sep, 2009	\$	843,234.04
Oct, 2009	\$	681,211.00
Nov, 2009	\$	1,587,845.36
Dec, 2009	\$	56,160.16

TOTAL	\$	3,266,339.48
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PCPUPESELL

Aug, 2009	\$	113,836.84
Sep, 2009	\$	497,614.24
Oct, 2009	\$	669,665.88
Nov, 2009	\$	828,802.64
Dec, 2009	\$	23,285.92
Jan, 2010	\$	684.88

TOTAL	\$	2,133,890.40
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IPROFITKIT

Oct, 2009	\$	50.84
Nov, 2009	\$	446,938.04
Dec, 2009	\$	37,961.92
Jan, 2010	\$	145,781.60

TOTAL	\$	630,732.40
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February 4, 2011

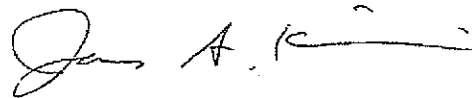
Kathryn C. Decker  
Federal Trade Commission  
915 Second Ave., Ste. 2896  
Seattle, WA 98174

Dear Casey:

Enclosed please find the transactional data you requested. Data that pertains to the penny auction sites is contained on JTM-I 00038. The spreadsheet attached as JTM-I 00039 concerns the tangible products.

Please let us know if you have any questions.

Sincerely,



James A. Kaminski

cc: Sean Moynihan, Esq.  
Klein Zelman Rothermel LLP

**JustThink Media**  
**Penny Auction Transactional Data**

SwipeBids/SwipeAuctions

Gross Sales

Initial:	\$31,889,327.60
Further Purchases:	\$3,324,690.46
Autoshipment:	\$508,919.55

Refunds

Initial & Further Purchases:	\$6,456,898.00
Autoshipment:	\$12,595.71

Selloffauctions

Gross Sales

Initial:	\$573,578.95
Further Purchases:	\$18,250.00

Refunds

Initial & Further Purchases:	\$1,883.00
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**Paygea 1**

Date	Total Sales	Total Refunds/Chargebacks
31-Jan-08	4,003,483.33	287,450.83
29-Feb-08		326,509.19
30-Apr-08		39,750.90
<b>TOTALS</b>	<u>4,003,483.33</u>	<u>653,710.92</u>

**Paygea 2**

Date	Total Sales	Total Refunds/Chargebacks
31-Jan-08	46,655.82	
29-Feb-08	5,162,884.42	138,818.20
30-Apr-08	4,723,418.34	755,060.87
<b>TOTALS</b>	<u>9,932,958.58</u>	<u>893,879.07</u>

**Litle 1**

Date	Total Sales	Total Refunds/Chargebacks
30-Apr-08	1,083,080.27	130.58
31-May-08	6,319,990.96	315,577.16
30-Jun-08	6,014,475.95	617,180.46
31-Jul-08	8,255,518.73	828,916.56
31-Aug-08	9,788,285.96	1,434,221.46
30-Sep-10	9,918,562.38	1,911,699.59
31-Oct-08	93,758.35	1,676,422.03
30-Nov-08	27,916.05	290,824.95
31-Dec-08		106,610.89
Jan - March 09		133,983.33
<b>TOTALS</b>	<u>41,501,588.65</u>	<u>7,315,567.01</u>

**Litle 2**

Date	Total Sales	Chargebacks
Jan 08 - Feb 09	<u>71,095,580.55</u>	<u>1,831,826.10</u>
<b>TOTALS COMBINED</b>	<u>128,365,437.21</u>	<u>8,863,157.00</u>